

BCPC Data Protection Policy



What is personal data?

Which data do we collect and store?

How and why does BCPC use personal data?

Who do we share personal data with?

How long do we keep it for?

What are your rights?

The General Data Protection Regulation (GDPR) protects the rights of individuals by setting out certain rules about what organisations can and cannot do with information about people. A key element to this is the principle to process individuals' data lawfully and fairly. In order to meet the fairness part of this we need to provide information on how we process personal data.

BCPC takes its obligations under the General Data Protection Regulation very seriously and will always ensure personal data is collected, handled, stored and shared in a secure manner. The following statement will outline what personal data we collect, how we use it and who we share it with. It will also provide guidance on your individual rights and how to make a complaint to the Information Commissioner's Office, the regulator for data protection in the UK.

BCPC's official contact details are:

1 Trim Bridge

Bath

BA1 1HD

Tel: 01225 429720

BCPC's Data Protection Officer is Sheila Apps

What is personal data?

Personal data is information relating to an identified or identifiable person. Examples include an individual's name, age, address, date of birth, gender and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to and not limited to an individual's health or medical data, racial or ethnic origin, religious or philosophical beliefs or data relating to sexual orientation.

Data subjects are defined as being individuals about whom information is held.

- Registered students and graduate members of BCPC
- Supervisors, Psychotherapists and Counsellors who offer their services to BCPC
- Staff, both academic and nonteaching, and volunteers (including Trustees)
- Clients who apply for counselling under the BCPC Low Cost Service

Which data do we collect and store?

- Name
- Date of Birth
- Ethnicity

- Address
- Phone
- Email
- Present and previous work
- Personal situation and background
- Educational background
- Details of previous therapy undertaken
- Health
- Disability
- We do not record your gender identity or religious beliefs

How and why does BCPC use personal data?

The largest volume of personal data BCPC collects is in relation to students.

The primary purposes for which we process information about **students** include:

- to enable us to administer student-related functions from original applications through to graduation and to provide graduate services
- to produce information including statistics for relevant external bodies such as Middlesex University, UKCP and BACP, and external agencies which provide training practice
- to enable BCPC staff to communicate with students
- to monitor academic progress over the period of enrolment towards completion of a qualification
- to carry out assessment, authorise award of qualifications and verification of awarded qualifications post-study
- to monitor complaints, disciplinary cases and academic appeals
- to provide student support services, including financial, pastoral and IT/learning resources
- to monitor, develop and update BCPC systems to ensure they continue to operate effectively and securely
- to monitor equality and diversity objectives within BCPC
- to carry out safeguarding

BCPC collects personal data in relation to **staff**, both academic and nonteaching, and volunteers (including Trustees):

- to facilitate recruitment activity
- to administer the requirements BCPC must meet as an employer in line with UK law
- to facilitate operational activity

BCPC processes personal data in relation to **graduates** and **members**:

- to build an engaged community for graduates and members
- to support their professional development
- underpinning a range of activities for our graduates and members, e.g. providing discounts on room hire and CPD events, sending event invitations, alerting recipients to job opportunities, consultations and BCPC news.
- to support professional registrations especially UKCP Accreditation, maintenance of UKCP Membership, and support to members who are audited.

BCPC collects personal **client** data in relation to BCPC Psychotherapy and Counselling Service and Low Cost Service for clinical and professional purposes in line with our Code of Ethics and Code of Practice, which includes meeting the requirements of current data protection legislation. The primary purposes we process information about clients and potential clients include:

- to carry out our obligations arising from any contracts entered into to provide psychotherapy and counselling services
- to plan and account for the use of the services provided

- to provide information about our services or similar services that may be relevant
- to notify you about changes to our services or services of our therapists
- to monitor complaints and disciplinary cases
- to monitor, develop and update our systems to ensure they continue to operate effectively and securely
- to monitor equality and diversity objectives within BCPC
- in order to effectively process payments

Who do we share personal data with?

BCPC is required to share personal data with certain other organisations in order to meet statutory requirements (such as tax, pensions and employment law, money laundering regulations) or to provide services to students, graduates, members, clients and staff. Sharing will always be undertaken in line with the requirements of data protection law, either through the consent of the individual, or another relevant legal gateway. The personal data that is actually shared will always be limited precisely to what the other organisation needs to meet its requirements or deliver its services. The information below outlines the key partners with whom BCPC shares personal data with on a periodic basis.

Professional and Funding Bodies:

- UKCP and BACP to process student, graduates and any other relevant individual's professional membership
- Middlesex University in order to process the administration of enrolment onto and graduation from the relevant validated programme(s). For further information please see the Middlesex University privacy notice.

National/Local Government Departments and other public bodies:

- UK Immigration agencies to ensure compliance with the conditions attached to student/staff visas

Other individuals / organisations:

- External examiners and moderators for examination, assessment and moderation purposes
- The organisation's insurers and legal advisers for the purpose of providing insurance cover or in the event of a claim
- For staff - to disclose employee salary details to HMRC, and external payroll and to The People's Pension, our pension providers, to meet legal pension provision requirements
- Placement providers for the purpose of coordinating student placement activity
- Employers, agencies and other academic institutions who request a reference from BCPC (for relevant staff and students)
- GPs or other medical or emergency services in the event of a risk of serious harm or to life
- Sponsors, bank loans and scholarship schemes - to allow for fees to be paid, students to access loans or to determine whether support should continue

How long does BCPC keep personal data?

BCPC takes its obligations under the DPA/GDPR seriously in terms of not holding onto personal data for longer than is necessary. BCPC has a retention schedule in place for the different categories of data it holds. In some cases, there are good reasons why BCPC needs to retain data about students and other individuals for a significant period of time. For instance, records of awards and transcripts will be held indefinitely. Key student, graduate, member and client records will be held for 7 years after the end of training, membership or therapeutic work. Other records will normally be held for shorter periods.

What are your rights?

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

For more information about these rights see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Right to object

If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address them with you. You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO's) if you believe your request has not been dealt with properly or you have a complaint to raise against BCPC for any other data protection related issue. A complaint can be raised via the ICO's website or write to the following address:

The Office of the Information Commissioner

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Your responsibilities

All students, staff and any other relevant individual who handle personal information which BCPC is responsible for must follow the requirements of our Data Protection Policy.

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